

DRAFT – FOR DISCUSSION PURPOSES

October 7, 2015 version

Yerington/Anaconda Mine Site

NDEP/EPA Management Coordination Schedule

October 2015

1. EPA and NDEP coordinate on Governor letter including mention of alternative paths (including but not limited to Gov withdraw concurrence under certain conditions or Gov propose formal deferral)
2. ARC provides memo describing proposed Remedial Action Objectives and General Response Alternatives for OU-1 groundwater (expected 10/9)
3. NDEP/ARC/SPS commence negotiations on state lead settlement proposal
 - a. NDEP convenes meeting with Lyon County, City of Yerington and companies (10/21)
4. SPS starts discussions with EPA/NDEP on enhanced evaporation proposal and legal protections requested
 - a. In parallel SPS develops a specific proposal in a pilot test workplan
5. EPA consults with YPT on NPL (date TBD)
6. EPA consults with City of Yerington and Lyon County on NPL (date TBD – NDEP to coordinate)
7. EPA sends Governor letter

November 2015

1. Pending status of ARC/SPS negotiations, NDEP schedules YPT/YCAG consultation on state lead settlement proposal (consultation may occur in December or later)
2. EPA/BLM/NDEP meeting on MOU update and roles responsibilities (11/9 – 11/10)
3. EPA/NDEP/ARC management meeting to start OU-1 FS (afternoon of 11/10 or morning of 11/11)

December 2015

1. Governor response to EPA letter
2. NDEP/ARC/SPS negotiations conclude
3. Pending NDEP/ARC/SPS negotiations, NDEP/EPA start discussions on MOA for state lead

January 2016

- SPS provides draft design for pilot enhanced evaporation test for NDEP/EPA review and comment

March 2016

1. NPL proposal in federal register
2. SPS provides final design for pilot enhanced evaporation test for NDEP/EPA approval
3. Any necessary agreements between SPS/EPA/NDEP to provide SPS legal protections completed

April 2016

- SPS evaporation pilot test commences in the field

June 2016

- Potential Freeport decision on Stage 3 investment (~\$30M)

October 2016

- Results of SPS evaporation pilot test available

March 2017

- NPL final